

5 Analysis of Alternatives

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to the Proposed Project. According to CEQA Guidelines, the range of alternatives “shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects” (CEQA Guidelines Section 15126.6(c)). The discussion must also include an evaluation of the No Project alternative to allow decision-makers to compare the impacts of approving the Proposed Project against the impacts of not approving it.

Case law suggests that the discussion of alternatives need not be exhaustive and that alternatives be subject to a rule of reason. The impacts of the alternatives may be discussed “in less detail than the significant effects of the project proposed” (CEQA Guidelines Section 15126.6(d)). Additionally, the CEQA Guidelines permit analysis of alternatives at a less detailed level for general plans and other program EIRs than that which is required for project EIRs. The CEQA Guidelines do not specify what constitutes an adequate level of detail, though they require that the EIR provide sufficient information to allow meaningful evaluation, analysis, and comparison of each alternative. The CEQA Guidelines require that this analysis identify the environmentally superior alternative among those analyzed. Quantified information on the alternatives is presented where available; however, in some cases only partial quantification can be provided because of data or analytical limitations.

5.1 Background on Development of Alternatives

The No Project alternative is the continuation of the existing General Plan and existing Downtown Specific Plan, as well as the absence of a Climate Action Plan (CAP). The additional alternative considered in this analysis was developed based on technical research conducted for a series of existing conditions working papers, as well as community input from workshops, stakeholder interviews, public meetings, and other public forums. The development of this alternative followed a process similar to the development of the proposed General Plan, which identified “change areas” versus areas that are likely to remain as is. The alternative was developed by evaluating different land use mixes for those same change areas in the Planning Area, based on careful consideration of alternative strategies for accommodating projected population and employment growth in Belmont while reflecting the core values identified in Belmont’s Vision Statement, which was adopted in 2003 and affirmed during the General Plan Update to be a relevant and valid representation of Belmont residents’ desires and priorities.

This alternative land use concept was further informed by the planning process for the Belmont Village Specific Plan, in which two land use and circulation concepts were developed and presented

for community feedback. Elements of the concept not chosen as the Preferred Plan were used to develop the alternative with respect to the BVSP Area.

5.2 Description of Alternatives

This chapter describes and evaluates two alternatives to the Proposed Project. One alternative was conceived by the consultant team as discussed above, and represents a differing vision for the form and location of future development within the city. The second alternative is the No Project alternative, which represents expected development patterns if the Proposed Project, consisting of the General Plan Update, the Phase I/Interim Zoning (Phase I Zoning), the Belmont Village Specific Plan (BVSP), and the CAP, were not to occur. This alternative would instead leave the existing General Plan (last updated in 1982) and the Downtown Specific Plan (adopted in 1990 and amended in 1995) in effect, with no CAP in place. The alternatives are referred to as:

- **Alternative 1: Balanced Mixed Use**
- **No Project Alternative**

Table 5.2-1 summarizes key characteristics of the Proposed Project, Alternative 1, and the No Project Alternative, and compares them to current data for existing conditions.

Table 5.2-1: Comparison of Key Characteristics; Existing, Alternatives, and Proposed General Plan

	<i>Existing (2013)</i>	<i>Proposed Project</i>	<i>Alternative 1</i>	<i>No Project</i>
Planning Area				
Population	26,400	30,500	32,800	29,000
Households	10,900	12,400	13,300	11,800
Jobs	10,100	13,400	13,200	11,900
Jobs/Housing Ratio	0.93	1.08	0.99	1.01
BVSP Area				
Population	670	1,780	2,070	1,160
Households	340	890	1,040	580
Jobs	1,440	2,450	2,230	2,180
Jobs/Housing Ratio	4.24	2.75	2.14	3.76

Notes:

1. Buildout estimations of households for the Planning Area assume 2.46 persons per household.
2. Values for alternatives and proposed General Plan are rounded to the nearest hundred for the Planning Area, and to the nearest ten for the BVSP Area.

Source: CCAG-VTA 2040 Model, Dyett & Bhatia, Kittelson & Associates, Inc., 2017

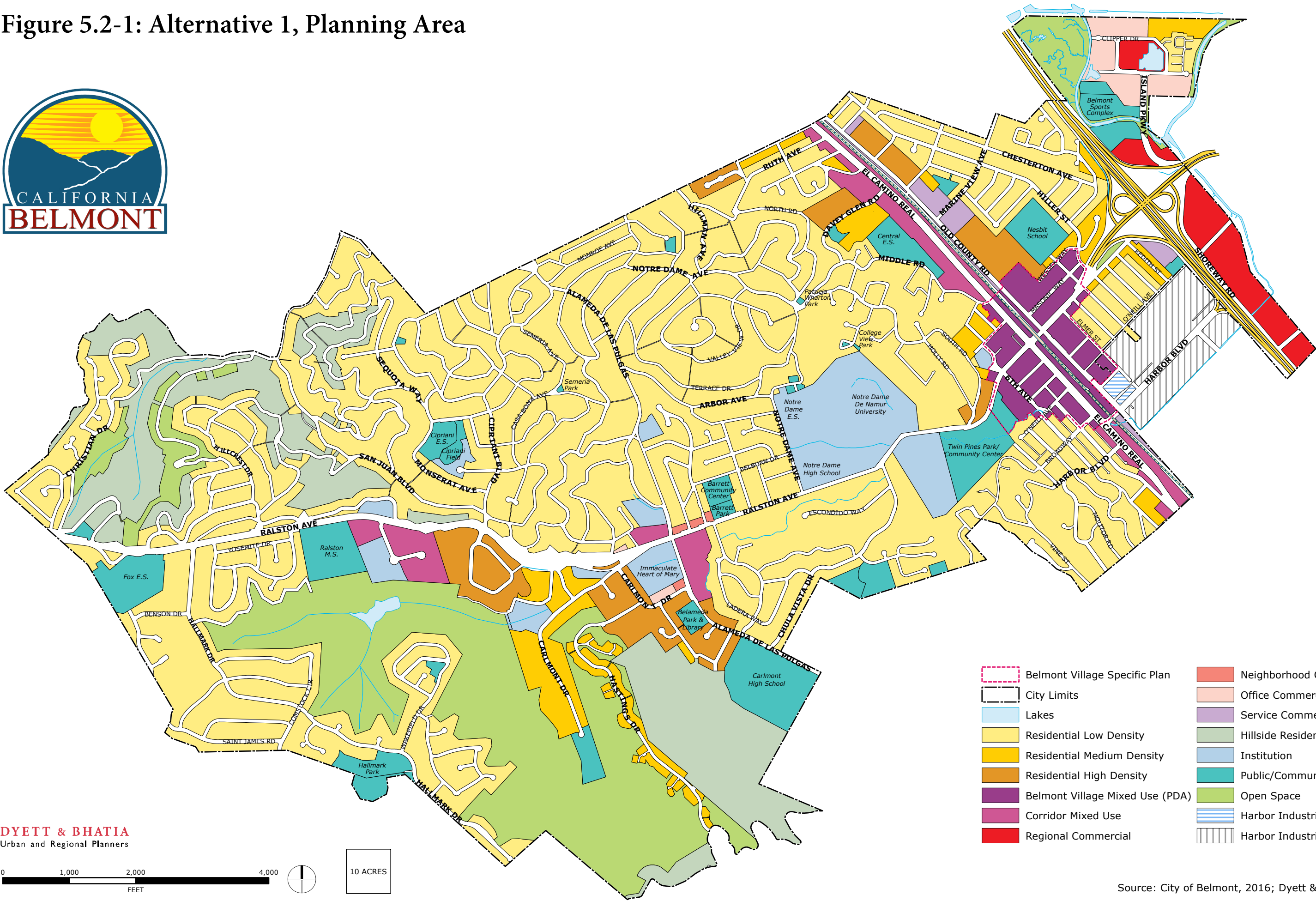
Alternative 1 and the Proposed Project both emphasize development in clusters in the Planning Area's eastern half. Both seek to provide new community and recreational amenities, strengthening of core activity centers, improved local and regional connectivity, enhanced quality of life and visual character, enhanced economic activity, and expanded educational facilities. Both envision the creation of a vibrant town center in the Belmont Village Area.

Alternative 1 and the Proposed Project are based on similar assumptions of buildout of opportunity sites within the Planning Area. Opportunity sites consist of sites that are currently vacant or underutilized, where the value of the land is worth substantially more than the value of the structure on the land. What distinguishes Alternative 1 is its revision of land use classifications to promote a more mixed-use environment in places that are single use under the Proposed Project, even though Alternative 1 does apply single-use designations to a few parcels within the BVSP Area that are mixed-use under the Proposed Project.

Figures 5.2-1 and 5.2-2 show conceptual land use diagrams of the Planning Area and the BVSP Area under Alternative 1, illustrating the differences in land use designations resulting from the different goals and assumptions underlying Alternative 1.

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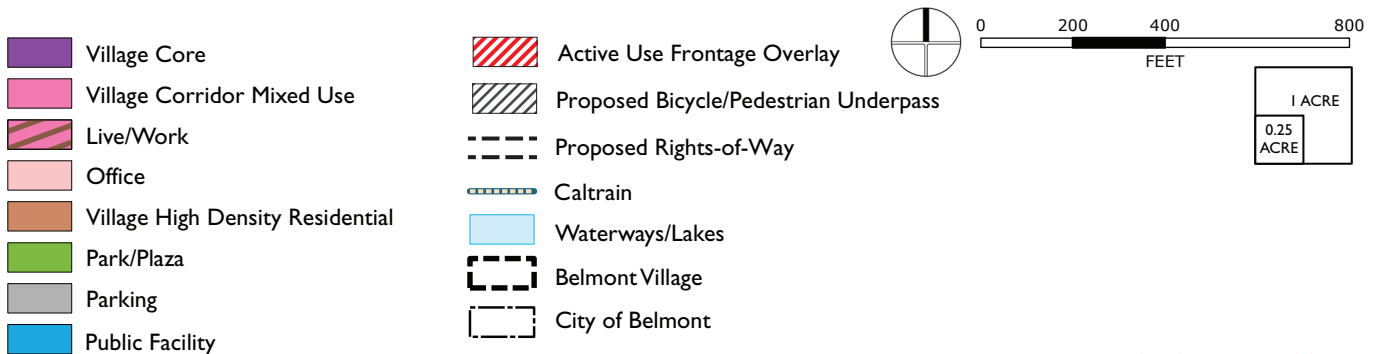
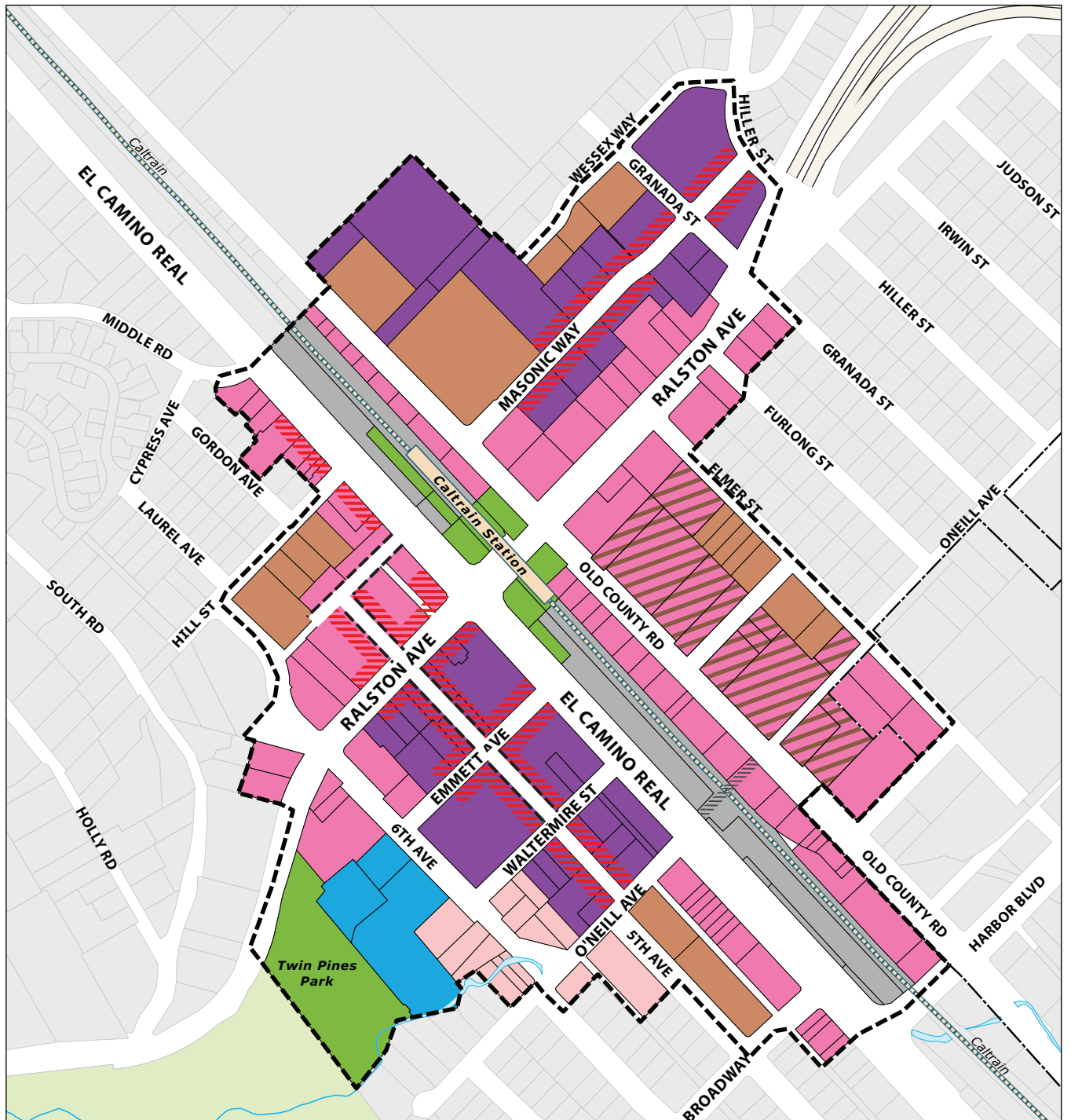
Figure 5.2-1: Alternative 1, Planning Area



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Source: City of Belmont, 2016; Dyett & Bhatia, 2016.

Figure 5.2-2: Alternative 1, BVSP Area



Source: City of Belmont, 2014; San Mateo County Assessor's Parcel Database, 2014

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ALTERNATIVE 1: BALANCED MIXED USE

This alternative was designed to provide a more balanced jobs/housing ratio, representing a more even balance between commercial and residential development, in the Planning Area both in total and by neighborhood (where possible). This in turn has the potential to reduce total vehicle miles traveled by allowing more residents of the Planning Area to have the opportunity to live closer to retail and commercial destinations, thereby making shorter trips to access goods and services within the Planning Area and potentially to live closer to where they work.

A better match between commercial and residential land uses in neighborhoods throughout the Planning Area is achieved relative to the Proposed Project in part through two additional mixed-use nodes (outside of the BVSP Area) along Ralston Avenue. Carlmont Village, which contains neighborhood commercial uses in the Proposed Project, and Davis Drive, which contains institutional and office uses in the Proposed Project, are both designated Corridor Mixed Use in Alternative 1, allowing these areas to provide multi-family housing as part of mixed-use development. See Figure 5.2-1.

Within the BVSP Area, as seen in Figure 5.2-2, the Station Core land use designation is removed. Instead, the Village Core land use designation, which allows for higher density housing, is applied on both sides of El Camino Real and the Caltrain tracks, creating more intense mixed use housing opportunities throughout the district. A “live/work” land use designation is introduced and applied to a cluster of parcels east of the Caltrain tracks and south of Ralston Avenue. While the allowable densities of the live/work designation under Alternative 1 and the Village Corridor Mixed Use designation under the Proposed Project are equivalent, the live/work designation allows a portion of the buildable square footage in Alternative 1 to function as both residential and non-residential space at the same time. High density residential housing is added west of the Caltrain tracks, which is balanced out by office space on the same side of the tracks. In addition, parcels lining the west side of the Caltrain tracks that are Village Corridor Mixed Use under the Proposed Project are designated to maintain the existing use as parking. These changes in total result in the potential for a more even balance of residential to commercial development in the BVSP Area than the Proposed Project.

Alternative 1 also assumes somewhat more housing relative to the Proposed Project within close proximity to NDNU, which would serve as additional student or faculty housing on site. This area has a particularly low jobs/housing ratio in the Proposed Project, which Alternative 1 attempts to ameliorate. While Figure 5.2-1 does not depict any differences in land use designations in the NDNU vicinity for Alternative 1 relative to the Proposed Project, additional housing would be achieved through a targeted housing density incentive bonus in that area, a partnership with NDNU, or a similar policy or implementation program.

Alternative 1 assumes adoption of the same CAP that is included within the Proposed Project.

Relative to the Proposed Project and the No Project alternative, this alternative assumes the most population growth. As shown in Table 5.2-1, the total number of jobs provided is lower than the Proposed Project, while the total number of households is higher, resulting in a citywide

jobs/housing ratio close to 1:1 and the most balance between commercial and residential development.¹

NO PROJECT ALTERNATIVE

The purpose of evaluating the No Project Alternative is to allow decision-makers to compare the potential impacts of approving the project with the potential impacts of not approving the project. The No Project analysis discusses both the existing conditions at the time the NOP is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved. The No Project alternative is depicted for the Planning Area and the BVSP Area in Figures 5.2-3 and 5.2-4, respectively.

The No Project scenario represents the continuation of the current General Plan (last updated in 1982) and Downtown Specific Plan (adopted in 1990 and amended in 1995) land use designations, with no CAP in effect. It assumes that the existing General Plan, Zoning Ordinance, and Downtown Specific Plan would continue to guide development in the Planning Area until buildout in 2035. There are many differences between the Proposed Project and the No Project Alternative. In relationship to the Proposed Project, the No Project Alternative:

- Has different land uses—both in mix and location;
- Has lower allowable land use densities/intensities, and mixed-use development and development of centers and walkable communities is not promoted to the same extent as in the Proposed Project;
- Is based on a different set of core values/goals and objectives;
- Has lower residential capacity; and
- Has reduced alternate modes of transportation, connectivity, and street capacity.

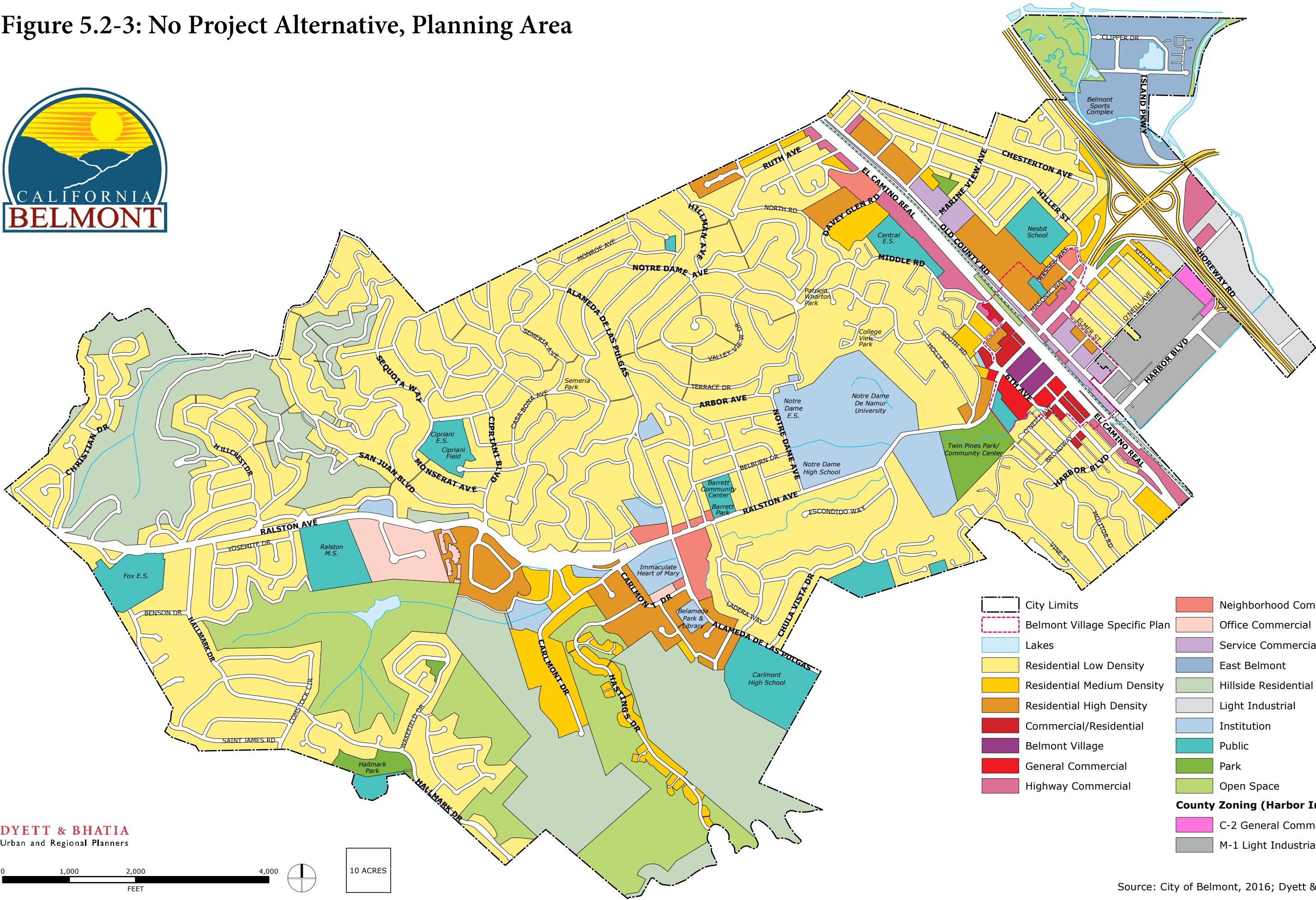
The buildout residential capacity under the No Project Alternative is shown above in Table 5.2-1.

PROPOSED PROJECT

The description of the Proposed Project, including the proposed General Plan, Phase I Zoning, BVSP, and CAP, is found in Chapter 3 of this Program EIR, “Project Description.” The proposed land use maps for the General Plan and BVSP are shown in Figures 3-4 and 3-5, respectively.

¹ A jobs/housing ratio of 1:1 does not imply that every job in Belmont is held by a Belmont resident; moreover, most Belmont households have more than one employed resident. However, the ratio of jobs to housing is a commonly used planning metric that broadly represents the balance of non-residential to residential development in a given area. While ratios of jobs to employed residents might more accurately reflect employment availability, the primary objective of the comparison in this case is to assess the basic mix of land uses and understand the relationship and proximity of housing to a variety of non-residential uses—employment, retail, services, etc.

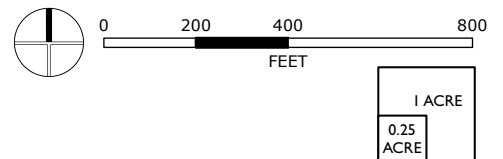
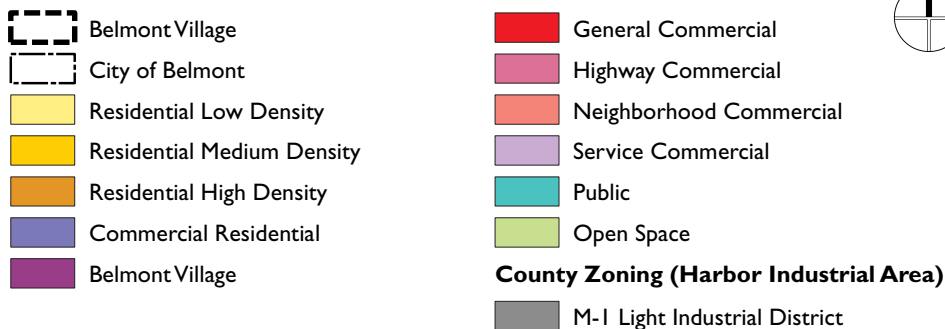
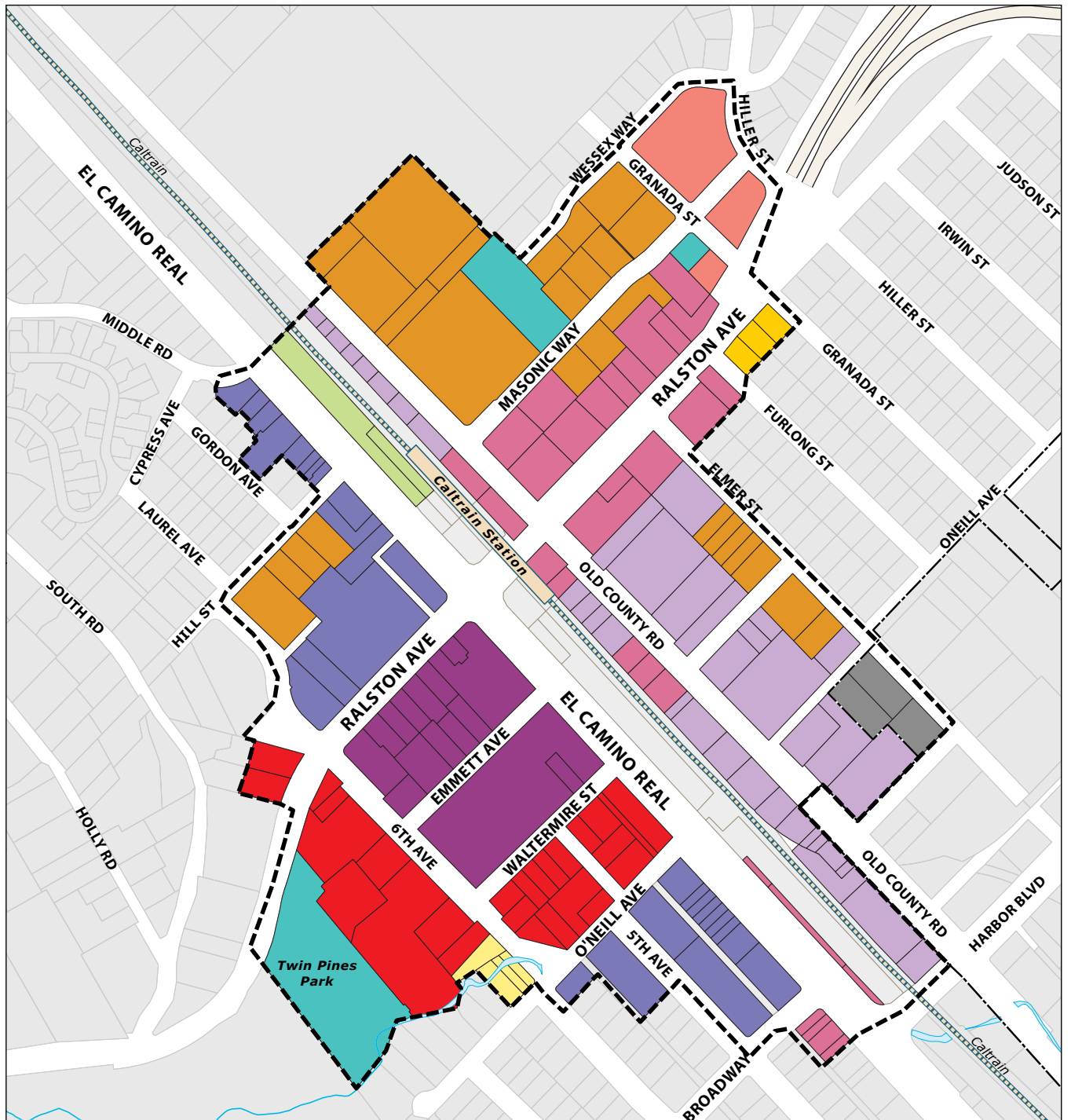
Figure 5.2-3: No Project Alternative, Planning Area



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Source: City of Belmont, 2016; Dyett & Bhatia, 2016.

Figure 5.2-4: No Project Alternative, BVSP Area



Source: City of Belmont, 2014; San Mateo County Assessor's Parcel Database, 2014

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5.3 Comparative Impact Analysis of Alternatives

This section compares the environmental impacts of each alternative to the Proposed Project, by resource topic. Alternatives are compared subject to the same significance criteria. It is assumed that Alternative 1 would generally include the same policies as those defined for the Proposed Project, excluding site-specific policies that would not apply because of differences in planned land use.

AESTHETICS

Differences in aesthetic impacts between the Proposed Project and Alternative 1 are minor and relate primarily to the intensity of development in different locations throughout the Planning Area. Alternative 1 would create mixed-use nodes in two locations along Ralston Avenue that are primarily single use under the Proposed Project, and would also result in greater intensity of residential development in the BVSP area. As all these locations are already urbanized, Alternative 1 would provide visual compatibility with existing development and would have no adverse impact on Belmont's scenic resources. In addition, Alternative 1 would generally include the same policies as those defined in the Proposed Project. These policies reduce the impact on aesthetics and ensure that Alternative 1 would not substantially degrade the existing visual character or quality of Belmont and its surroundings. Therefore, similar to the Proposed Project, Alternative 1 would have a less than significant impact regarding aesthetics.

The No Project Alternative would result in less development overall than either the Proposed Project or Alternative 1. It follows that this alternative will produce fewer view obstructions, fewer sources of light and glare, and less construction activity, most notably in the BVSP Area. However, while the No Project Alternative recommends a public plaza within the center of the BVSP Area (which the Proposed Project also does), the Proposed Project and Alternative 1 each contain specific policies and design guidelines that would result in more visually appealing amenities and facilities throughout the BVSP Area, such as plazas, paseos, playgrounds, green spaces, and small pocket parks. Additionally, without the benefit of the new Proposed Project policies, development standards, and design guidelines, the No Project Alternative will not have updated community design policies for visual resources. Thus, while the No Project Alternative would result in less development overall than either the Proposed Project or Alternative 1, it is possible that the development that would result would be of a lower aesthetic quality or have more aesthetic-related impacts. On balance, while the No Project Alternative would also have a less than significant impact regarding aesthetics overall, its impact may be slightly greater than that of the Proposed Project and Alternative 1.

AIR QUALITY

The types of air quality impacts under Alternative 1 would be similar to those under the Proposed Project, but of a slightly greater magnitude. As with the Proposed Project, construction and operation of building features would generate criteria pollutant emissions that could exceed the Bay Area Air Quality Management District's (BAAQMD's) significance thresholds. While fewer employment opportunities may indicate less commercial development, construction emissions are anticipated to be greater under Alternative 1 than the Proposed Project since more residences would be constructed. There is also the potential for reactive organic gas (ROG) emissions from

consumer products to be slightly higher under Alternative 1, relative to the Proposed Project, as a result of the greater number of residential units. Similarly, as discussed below, while vehicle miles traveled (VMT) per service population are anticipated to be approximately two percent lower under Alternative 1 as compared to the Proposed Project, total daily VMT in the Planning Area and associated operational mobile source emissions would be approximately two percent greater than the total daily VMT anticipated under the Proposed Project (see Table 5.2-4). Mitigation Measures AQ-1 through AQ-5, identified in Section 4.2 of this EIR, “Air Quality,” would reduce emissions, but the potential to exceed BAAQMD’s thresholds would remain.

Implementation of Alternative 1 could expose new residents within the Planning Area and existing sensitive receptors in adjacent residential developments to significant health risks from exposure to ambient toxic air contaminants (TACs), as well as construction- and operational-related diesel particulate matter (DPM) emissions. Similar to criteria pollutant emissions, DPM generated by Alternative 1 would be greater than under the Proposed Project. Emissions would be reduced through the use of best available control technologies under Mitigation Measures AQ-1 and AQ-2, or by compliance with AQ-6. However, Alternative 1 would result in significant and unavoidable impacts and a greater impact with respect to air quality than the Proposed Project.

As under the Proposed Project, receptor exposure to operational carbon monoxide (CO), asbestos, and odors would be less than significant under Alternative 1. CO modeling for the Proposed Project showed that no new localized violations of the 1-hour or 8-hour ambient air quality standards would occur, and the same conclusion would be expected for the Alternative 1, despite an approximate two percent increase in overall (not per capita) VMT. All projects requiring demolition would be required to comply with BAAQMD Regulation XI, Rule 11-2. Odor emissions during construction and operation would not result in nuisance violations since no new odor generating facilities would be constructed.

The types of air quality impacts under the No Project Alternative would be similar to those under the Proposed Project, but of a lesser overall magnitude. Development would be consistent with the existing General Plan and existing Downtown Specific Plan. As discussed below, VMT per service population are anticipated to be approximately one percent lower under the No Project Alternative as compared to the Proposed Project. Total daily VMT in the Planning Area and associated operational mobile source emissions would be approximately ten percent lower than the total daily VMT anticipated under the Proposed Project (see Table 5.2-4). While the extent of construction and operational activities would be less under the No Project Alternative than under the Proposed Project, criteria pollutant emissions generated by the No Project Alternative would still exceed the BAAQMD’s significance thresholds and result in a significant air quality impact during construction and operation (see Table 4.2-12 in Section 4.2 of this EIR, “Air Quality”). The No Project Alternative would be required to comply with all state and local rules and regulations to control criteria pollutant emissions.

Implementation of the No Project Alternative could expose new residents within the Planning Area and existing sensitive receptors in adjacent residential developments to significant health risks from exposure to ambient TACs, as well as construction- and operational-related DPM. Similar to criteria pollutant emissions, DPM generated by the No Project Alternative would be less than that of the Proposed Project. Emissions would be reduced through best available control technologies

identified in mitigation measures in project-specific environmental documents, but would nonetheless remain significant and unavoidable.

Similar to the Proposed Project, receptor exposure to operational CO, asbestos, and odors would be less than significant. CO modeling for the No Project Alternative (see Table 4.2-15 in Section 4.2 of this EIR, “Air Quality”) showed that no new localized violations of the 1-hour or 8-hour ambient air quality standards would occur. All projects requiring demolition would be required to comply with BAAQMD Regulation XI, Rule 11-2. Odor emissions during construction and operation would not result in nuisance violations since no new odor generating facilities would be constructed.

BIOLOGICAL RESOURCES

The Proposed Project and Alternative 1 would protect Belmont’s habitat by focusing development in currently built up areas and including policies that would help protect Belmont’s tree- and shrub-dominated, herbaceous-dominated, and aquatic habitats.

While the uses and intensity of development differ between Alternative 1 and the Proposed Project in specific areas, the impacts of development on biological resources would be comparable as they would both result in approximately the same urban footprint. The opportunity sites in Alternative 1 and the Proposed Project are infill sites, and no adopted Habitat Conservation Plans apply to the Planning Area. Therefore, similar to the Proposed Project, Alternative 1 would have a less than significant impact regarding biological resources.

The No Project alternative, while possessing approximately the same urban footprint as Alternative 1 and the Proposed Project, would result in less total development than either. As discussed in Section 4.3 of this EIR, “Biological Resources,” although vacant lots that may currently provide habitat may develop under the Proposed Project and Alternative 1, these lots are currently allowed to develop under the existing General Plan as part of the No Project Alternative. As a result, the No Project Alternative would not have substantially different impacts on biological resources in the Planning Area, but could potentially lead to development in outlying areas where biological resources could be disturbed. However, similar to the Proposed Project, the No Project alternative would have a less than significant impact regarding biological resources.

CULTURAL RESOURCES

The comparison of impacts to historic, archeological, and paleontological resources by alternatives is based on the degree and location of new development proposed within each alternative. Cultural resources include buildings of historical importance, registered historic sites and archaeological resources.

The City of Belmont has three sites on Ralston Avenue listed on the National Register of Historic Resources: Ralston Hall, Chapel/Conference Center, and Carriage House/Art Center. Eight properties within the Planning Area were identified as eligible for the National Register of Historic Resources. Four properties are listed on the California Office of Historic Properties Directory. Belmont also has local historical landmarks in addition to these sites. In December of 2014, the City contacted five tribes to determine if any tribal cultural resources are located within the area affected

by the Proposed Project, however, no requests for consultation were received and the City is unaware of any substantial evidence that suggests additional tribal cultural resources may be present.

Similar to the Proposed Project, Alternative 1 may result in actions that could adversely affect historic resources, though both would minimize or avoid impacts to historical resources through goals and policies meant to create incentives for preservation and to incorporate historic preservation directly in the Zoning Ordinance. Mitigation Measures CULT-1 and CULT-2, identified in Section 4.4 of this EIR, “Cultural Resources,” would also apply to Alternative 1 and would further minimize impacts by preserving the Firehouse Building façade and placing historical signage at the site. While the No Project Alternative lacks the Proposed Project policies, it proposes development that is lower in intensity than either Alternative 1 or the Proposed Project propose, and may therefore result in impacts to cultural resources that are less than significant without the need for mitigation, as minimal infill development and redevelopment will result in less disturbance to historic resources.

GEOLOGY, SOILS, AND SEISMICITY

There are no active faults that run through the Planning Area, though the San Andreas Fault Zone – Peninsula is located approximately one mile from the Planning Area’s western boundary. The California Geologic Survey does not include the City of Belmont on its list of cities affected by Alquist-Priolo Earthquake Zones. However, Belmont is located within a seismically active region and earthquakes do have the potential to cause groundshaking. Alternative 1 has the potential to expose a greater number of people to seismic risks than the Proposed Project, as it proposes greater amounts of residential development, even if it proposes less nonresidential development.

The No Project alternative would expose fewer people to seismic risks. However, current state and federal regulations require specific engineering and design criteria to minimize impacts related to seismic and geologic hazards. These regulations apply equally to development under the Proposed Project and Alternative 1.

Impacts to geology and soil resources would be comparable under Alternative 1 and the Proposed Project due to construction impacts, as the total amount of proposed development is similar. The No Project Alternative proposes development that is smaller in scope to those anticipated under the Proposed Project. Therefore, this alternative would result in the least exposure to geologic and seismic hazards. However, attracting people to a seismically active area does not, in and of itself, constitute a significant effect on the environment and therefore does not present a potential impact for purposes of analysis under CEQA unless the Proposed Project, the Alternative 1, or the No Project Alternative would exacerbate existing environmental hazards or conditions that already exist.²

ENERGY, GREENHOUSE GASES AND CLIMATE CHANGE

Greenhouse Gas (GHG) impacts under Alternative 1 would be similar to those under the Proposed Project. Similar to criteria air pollutant emissions, construction and operational GHG emissions

² See *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)* (2015) 62 Cal. 4th 369, 390.

associated with Alternative 1 would likely be slightly greater than those estimated for the Proposed Project since overall VMT would be higher and more construction would occur. However, development under Alternative 1 would be consistent with the CAP, and compliance with the CAP would reduce emissions consistent with relative reductions estimated for the Proposed Project. Since the CAP is consistent with Assembly Bill (AB) 32, Senate Bill (SB) 32, and Executive Order (EO) S-3-05, Alternative 1 would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Although the increase in residents would create a slightly higher demand for public services, utilities, and energy, development under Alternative 1 would be subject to the same energy-saving policies that are incorporated into the Proposed Project. Accordingly, the relative energy intensity would be lower than existing and 2035 No Project conditions as a result of sustainability initiatives. As such, similar to the Proposed Project, Alternative 1 would result in a less than significant impact with respect to energy, because it would not result in a wasteful, inefficient, and unnecessary usage of energy.

The No Project Alternative would result in less overall growth than the Proposed Project. However, because the proposed General Plan, BVSP, and CAP would not be adopted under the No Project Alternative, sustainability policies intended to reduce GHG emissions would not be incorporated into the project design. As shown in Table 4.6-11, without implementation of the GHG reduction measures in the proposed CAP, 2035 “business as usual” (BAU) emissions, which are representative of GHG emissions under the No Project Alternative, would not meet the City’s 2035 emissions reduction target under SB 32. Therefore, GHG emissions in 2020 and at full build out (2035) would be greater under the No Project Alternative and would conflict with statewide GHG reduction targets established under AB 32, SB 32, and EO S-3-05, resulting in a significant and unavoidable impact.

Although energy- and resource-conserving measures would most likely be utilized under the No Project Alternative, it is not assumed that measures under this alternative would match the energy-saving policies incorporated in the Proposed Project. Therefore, energy conservation under the No Project Alternative would not be incorporated into the No Project Alternative to the same extent as for the Proposed Project, making the impact greater, although the impact would still be less than significant since all new development would still comply with state and local energy conservation measures.

HAZARDS AND HAZARDOUS MATERIALS

Generally, the impacts of hazardous materials are determined by exposure to existing hazardous materials, as well as the level and nature of job growth. Jobs in the industrial sector, for example, could indicate the presence of hazardous materials related to industrial uses. Office or retail jobs might be expected to generate less than those in the industrial sector, but more than residential homes. Redevelopment is another potential indicator, as the demolition of older buildings can expose people and the environment to asbestos and lead-based paint. Locating new development on sites included on a list of hazardous materials site could also create a hazard to the public or the environment; however, new development on contaminated sites would be required by the California Hazardous Waste Control Law, the Porter-Cologne Water Quality Act, and other legislation to remediate hazardous substances.

Alternative 1 and the Proposed Project shift away from industrial uses by eliminating the industrial land use designation that is found under the existing General Plan and, by extension, the No Project Alternative. This shift is pronounced in the Harbor Industrial Area, where Alternative 1 and the Proposed Project both envision more mixed-use development, including some residential development, in an area that would continue to be primarily industrial under the No Project Alternative. As mentioned above, while such development could increase exposure to hazardous materials, new development will be legally required to remediate any hazardous substances. As a result, the Proposed Project and Alternative 1 would similarly have fewer hazardous materials impacts related to the prevalence of industrial uses.

While Alternative 1 would result in less job growth than the Proposed Project, in terms of industrial employment, both Alternative 1 and the Proposed Project would result in a similar decrease of approximately 1,100 industrial jobs. On the other hand, the No Project Alternative would result in an increase of approximately 300 industrial jobs, resulting in more industrial workers potentially being exposed to hazardous materials. While Alternative 1 would have similar impacts related to hazardous materials to the Proposed Project due to similar changes in industrial jobs and land uses, the No Project Alternative would have the greatest impacts due to relatively higher numbers of industrial jobs and relatively more land designated for industrial use.

Airport Safety and Wildfires

Development under Alternative 1 and the No Project Alternative would be consistent with the San Carlos Airport Land Use Compatibility Plan (ALUCP). The ALUCP promotes compatibility between the San Carlos Airport and land uses that surrounded the airport.

As new development would replace existing structures built before modern building codes for fire safety and building systems were in place with buildings with improved fire safety, increased construction would improve fire safety. Both Alternative 1 and the Proposed Project would result in increased construction of structures with improved fire safety relative to the No Project Alternative. The No Project Alternative would result in more structures with outdated fire safety systems, and therefore a greater adverse impact on fire safety.

HYDROLOGY, FLOODING, AND WATER QUALITY

Urban development can bring about an increase in impervious surfaces that could lead to increased run-off rates and flooding in downstream areas. The Proposed Project and Alternative 1 focus new development in currently built-up areas, which limits impacts to hydrology and flooding.

Alternative 1 will result in a similar level of development to the Proposed Project, resulting in similar construction activities. Construction activities may cause temporary impacts to the region's hydrology due to earth movement. The majority of new developments are planned at infill sites along the main transportation corridors, which reduces the significance of impacts. As described under Impact 4.8-6 in Section 4.8 of this EIR, "Hydrology, Flooding, and Water Quality," the Proposed Project, as well as Alternative 1, would allow for increased housing density relative to the No Project Alternative on select parcels within the 100-year flood hazard area of the Belmont Creek. However, Belmont requires a special use permit for any development proposed in areas of special flood hazards and areas of flood-related erosion hazards (Municipal Code Chapter 7, Article IX).

This requirement would apply to the two alternatives and the Proposed Project equally. The ordinance also restricts or prohibits land uses considered unsafe in a floodplain. Furthermore, Proposed Project policies restrict or prohibit land uses considered unsafe in a floodplain, and would further reduce potential impacts to residential development within the 100-year flood hazards areas.

Alternative 1, similar to the Proposed Project, would allow for additional development that would increase the amount of impervious surfaces and could therefore increase the amount of runoff and associated pollutants during both construction and operation, though this is mitigated by requirements to comply with the National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit.

The No Project Alternative will result in the least amount of development—resulting in the least amount of impervious surface area and lowest level of construction activity associated with development. While the No Project Alternative would not benefit from Proposed Project policies that restrict land uses within a floodplain, the special use permit requirement for development proposals in areas of flood hazards would still apply. Consequently, the overall impact to hydrology and flooding under the No Project Alternative would be less than Alternative 1 or the Proposed Project, though the impact is less than significant in each case.

LAND USE, POPULATION, AND HOUSING

As with the Proposed Project, Alternative 1, if adopted, would become the Planning Area’s new guiding document for development; all local plans and zoning regulations would be amended to conform to the alternative’s policies. The No Project Alternative represents the existing General Plan and Downtown Specific Plan, implemented by the current zoning ordinance. As such, the No Project Alternative does not conflict with current applicable general plans or specific plans, and would have a less than significant impact in that regard.

Alternative 1 is expected to result in different patterns, degrees, and intensities of growth. It would not cause significant land use impacts by disrupting or displacing communities or businesses, or by restricting neighborhood access to services or amenities. Alternative 1 shares the policies of the Proposed Project that establish compatibility requirements for new development, and propose a number of improvements intended to enhance connectivity within the BVSP Area and the Planning Area as a whole. As discussed in Section 4.9 of this EIR, “Land Use, Housing, and Population” the majority of developed land in the Planning Area is comprised of residential uses, which are not anticipated to undergo significant land use changes under the Proposed Project or Alternative 1. The Proposed Project and Alternative 1 focus infill development opportunities in vacant and underutilized areas in Belmont, while policies seek to preserve existing neighborhoods. Furthermore, the Proposed Project and Alternative 1 will encourage the provision of lower- and moderate-income housing, providing housing opportunities for residents of all income levels within the city. Meanwhile, the Proposed Project and Alternative 1 would also support the development of additional jobs, while featuring policies to both retain and foster existing businesses and attract new ones. The No Project Alternative, meanwhile, is a continuation of current trends and policies.

Housing Units and Population

Table 5.2-1 shows a comparison of housing units and population at full buildout of the Proposed Project, Alternative 1, and the No Project Alternative, in both the Planning Area and the BVSP Area. Alternative 1 has higher proposed residential capacity than the Proposed Project, by approximately 900 units in the Planning Area and approximately 150 units in the BVSP Area, due to a land use mix in Alternative 1 that prioritizes housing as well as policies that encourage a greater share of housing within mixed-use development. Alternative 1 buildout projections estimate a 2035 population of 32,800. With a population of 26,400 during base year 2013, this amounts to an average annual growth rate of 0.99 percent. This population growth rate is greater than the region-wide projected annual growth rate for the same time period (ABAG-projected population growth between 2015 and 2035 for the region is 1,427,000 people³, which amounts to an annual growth rate of 0.88 percent), which in turn is greater than the annual growth rate of 0.66 percent for the Proposed Project over the same time period. While development under Alternative 1 would occur incrementally over time, inducing population growth that outpaces regional growth and Belmont's projected share of that growth could constitute a significant impact.

The No Project Alternative has lower residential capacity than the Proposed Project, by approximately 600 units overall and by 310 units in the BVSP Area. Therefore, the No Project Alternative has a less than significant impact regarding growth inducement, and its impact is also lower than that of the Proposed Project.

Residential Development and Growth Management Capacity

As discussed in Chapter 6 of this EIR, "CEQA Required Conclusions," the Planning Area is fully urbanized and lacks opportunities for greenfield development, as the only large open, undeveloped areas are designated for open space. Given the constraints of its natural geography as well as the presence of neighboring communities, outward growth cannot be induced, leaving only opportunities for increasing density in already developed areas.

The Proposed Project, as well as Alternative 1, allows for increased housing development and resulting population growth. This growth is necessary in order to meet Belmont's Regional Housing Need Allocation (RHNA), as well as in accordance with the regional policies of Plan Bay Area 2040 to "prioritize more compact, mixed-use development that combines both residential and commercial uses and is located close to public transit, jobs, schools, shopping, parks, recreation and other amenities." The scale of housing development in the No Project Alternative is significantly below that of the Proposed Project and Alternative 1, and, while it meets Belmont's RHNA requirement, it is not sufficient to meet the policies of Plan Bay Area 2040. Thus, the No Project Alternative would have a significant impact in conflicting with the applicable population growth-related land use plan—Plan Bay Area 2040.

Proposed Project policies that would be incorporated into Alternative 1 promote preservation both of open spaces and Belmont's wooded residential areas, which limit growth outside of the target areas that are recommended by Plan Bay Area. Furthermore, the Proposed Project and Alternative

³ ABAG. Forecasts and Projects. Available at <http://abag.ca.gov/planning/research/forecasts.html>. Accessed on November 9, 2016.

1 do not include any large-scale infrastructure improvements such as road widening that would induce further growth. Utility improvements will take place along existing utility lines and in already impacted areas. The only infrastructure that will result from the Proposed Project and Alternative 1 will be sized to meet the capacity required by the permitted amount of development. Therefore, similar to the Proposed Project, Alternative 1 would have a less than significant impact.

NOISE

Overall, both alternatives would result in similar construction noise impacts as the Proposed Project, because the type of noise-generating activities that would occur would be similar to those under the Proposed Project on maximum activity days. That is, the same general levels of noise shown in Table 4.10-12 in Section 4.10 of this EIR, “Noise,” would be expected to occur for both alternatives, because the type of development (i.e. excavation, building construction, etc.) would be similar to the Proposed Project. This would result in a significant and unavoidable construction noise impact for both alternatives. The duration of construction noise, however, would differ between both alternatives and the Proposed Project. The construction duration of the No Project alternative would be shorter than the construction duration of the Proposed Project because the No Project alternative would involve less development. The construction noise impact for the No Project alternative would therefore be less than the Proposed Project’s construction noise impact. The construction duration of Alternative 1 would be slightly longer than the construction duration of the Proposed Project because Alternative 1 would construct more housing. The construction noise impact for Alternative 1 would therefore be slightly greater than the Proposed Project’s construction noise impact.

Like the Proposed Project, both alternatives would result in permanent increases in ambient noise levels due to traffic noise as compared to existing conditions. As shown in Table 5.2-4, the No Project Alternative would have a lower overall daily VMT than the Proposed Project. However, as shown in Table 4.10-14, traffic noise levels under the Year 2035 No Project scenario, which is representative of the No Project Alternative, would still exceed the existing and proposed General Plan’s community noise exposure standard for single-family residential uses along some roadway corridors. Therefore, operational noise impacts associated with traffic would be significant and unavoidable under the No Project Alternative, albeit less than those of the Proposed Project. Since Alternative 1 would generate more traffic than the No Project Alternative, operational traffic noise impacts under Alternative 1 would also be significant and unavoidable. Given that the VMT in the Planning Area for Alternative 1 would be approximately two percent greater than the total daily VMT anticipated under the Proposed Project (see Table 5.2-4), traffic noise impacts under Alternative 1 would be greater than those under the Proposed Project.

Train noise could affect sensitive land uses under both alternatives, because, like the Proposed Project, residential development would be constructed near the Caltrain tracks. However, CEQA does not generally require that existing conditions, including train noise, be evaluated for its impacts on a project, so the impacts of train noise under the alternatives are discussed for information purposes only and are not significant for CEQA purposes.

The impacts of stationary source noise for the alternatives would be similar to the impacts on the Proposed Project, because the differences in development between the Proposed Project and the alternatives (i.e. higher and lower density housing) would not result in substantially more or less

potential for stationary sources of noise to occur. Vibration impacts resulting from construction of both alternatives would be similar to those under the Proposed Project on maximum activity days because the types of equipment and activities would be similar. As is the case with the Proposed Project, it may not be feasible to mitigate construction vibration in all cases, resulting in significant and unavoidable construction vibration impacts under both alternatives. However, the overall duration of vibration impacts resulting from construction of Alternative 1 would be slightly greater than the Proposed Project because Alternative 1 would involve slightly more construction than the Proposed Project. Furthermore, the duration of vibration impacts resulting from construction of the No Project Alternative would be slightly less than the Proposed Project because the No Project alternative would involve less construction than the Proposed Project.

Regarding noise impacts from public airports and private airstrips, the impacts for the alternatives would be identical to the impacts discussed for the Proposed Project, because the same general area would be developed and the alternatives would implement the same community noise exposure limits established in the proposed General Plan Noise Element, which do not conflict with the nearest noise contour line associated with the San Carlos Airport. Like the Proposed Project, neither alternative would expose people to excessive levels of noise from aircraft overflight, and the impact would be less than significant.

PUBLIC SERVICES AND RECREATION

Development under the Proposed Project and both alternatives would require schools, public services and facilities, and parks. As described in Section 4.11 of this EIR, “Public Services and Recreation,” it is projected that school enrollment under the Proposed Project will likely be higher than the designated capacity for both school districts in the Planning Area. However, a new school building at Carlmont High School is scheduled for construction in 2017. Additionally, Proposed Project policies require collaboration with the public school districts to ensure school facilities expand to accommodate new students, and any new or expanded public school facility would trigger project-level environmental review. While Alternative 1 would result in increased population and therefore increased school enrollment, the same Proposed Project policies will ensure that provision of new facilities would not cause adverse environmental effects. The No Project Alternative would have the least population growth and therefore the least impacts to the physical school environment.

For police, fire, and emergency services, the Proposed Project and both alternatives would require the additional growth of these services to accommodate additional population growth; while the greatest growth in services would be from Alternative 1, the physical impact of service expansion (resulting from the need for a new fire station, for example), would be the same. The No Project Alternative would have the least population growth and therefore the least impacts to the physical environment related to police, fire, and emergency services.

TRANSPORTATION

Alternative 1 shares the Proposed Project’s core vision statement for walking, biking, public transportation, and connectivity to “put a priority on getting out of, into, and through town efficiently” and ensure “bicyclists, walkers, and other non-drivers get where they’re going easily and safely.” This section provides analysis for each alternative on the street system and the overall accessibility of residents and employees to transit, bicycle, and pedestrian facilities.

Vehicle Miles Traveled

Alternative 1 and the No Project were converted into the format necessary for incorporation into the City/County Association of Governments' of San Mateo County's (C/CAG) travel demand model, known as the CCAG-VTA 2040 Model. The Model utilizes transportation analysis zones (TAZ) to locate housing and jobs. These zones do not directly correspond to city limits, and because of this, jobs located in the TAZ corresponding to the Harbor Industrial Area (most of which is in the City of San Carlos) have been identified separately from jobs located in the remainder of the Planning Area. A model run was conducted for each concept by Kittelson & Associates (KAI). VMT and Average Daily Vehicle Trip Generation (ADT) were extracted directly from the model for 2013 and 2040 for each TAZ. These forecasts were interpolated back to 2035 to match the General Plan year. The VMT represents the model vehicle trips multiplied by the distance travelled for each trip. Average Trip length was also computed using the model. Per Capita VMT was computed for each TAZ and citywide using the VMT for each TAZ divided by the persons in each TAZ. Additional metrics, estimates developed by KAI, and GIS mapping were used to assess transportation performance for the alternatives. The purpose of this analysis was to conduct a comparative assessment and describe the overall transportation effects of the various alternatives. However, the analysis of alternatives is at a lesser level of detail than the assessment of the Proposed Project. The CCAG-VTA 2040 Model was used to determine the VMT associated with the Planning Area for the No Project Alternative, the Proposed Project, and Alternative 1 for the 2035 horizon year, summarized in Appendix E. The No Project Alternative represents buildout of the previously adopted General Plan and any proposed regional transportation network improvements, but it does not include any of the local improvements associated with the Proposed Project. However, the No Project Alternative does incorporate the following transportation network improvements, which would be implemented regardless of whether the Proposed Project is implemented:

- **Ralston Avenue/Tahoe Drive:** Convert from two-way stop control to a traffic signal. No changes to the lane configuration.
- **Ralston Avenue/South Road:** Convert from all-way stop control to a traffic signal. Remove southbound right-turn channelization and restripe southbound approach to have one right-turn lane and one left-turn lane.

The Proposed Project and Alternative 1 both incorporate the transportation network improvements summarized in Table 5.2-3.

Table 5.2-3: Citywide Intersection Modifications Proposed Project/Alternative I

<i>Study Intersection</i>	<i>Control</i>	<i>Source/ Justification</i>	<i>Improvement</i>
1. Ralston Avenue/SR 92 Westbound Ramps	Signal	RCS	Stripe bike lanes and green bicycle conflict markings
2. Ralston Avenue/SR 92 Eastbound Ramps	Signal	RCS	Replace standard crosswalks, Stripe green bicycle conflict marking WB, Landscape median
3. Ralston Avenue/Hallmark Drive	Signal	RCS	Replace standard crosswalk, Signal timing update to account for increased time allocated for pedestrian crossing
4. Ralston Avenue/Belmont Canyon Road	Signal	RCS	Replace standard crosswalk, Install bicycle detection
5. Ralston Avenue/Tahoe Drive	Signal	RCS	Remove median nose from crosswalk
6. Ralston Avenue/Davis Drive	Signal	RCS	Replace standard crosswalk, Install pedestrian refuge island
7. Ralston Avenue/Cipriani Drive	Signal	RCS	Remove all right-turn channelizing islands, Replace standard crosswalk, Install bicycle detection
8. Ralston Avenue/Alameda de las Pulgas	Signal	RCS	Replace standard crosswalks, Stripe bike lanes
9. Ralston Avenue/Notre Dame Avenue	Signal	RCS	Install traffic signal with EB left turn lane, Eliminate EB merge lane, Replace standard crosswalk, Stripe bike lanes
10. Ralston Avenue/Chula Vista Drive	TWSC	RCS	Prohibit NB left turn – direct to roundabout for U-turn, remove WB merge lane, Install enhanced crossing treatments
11. Ralston Avenue/Notre Dame University Road	Round-about	RCS	Install roundabout at existing intersection location; convert all approaches to one lane
12. Ralston Avenue/South Road	Signal	RCS	Replace standard crosswalks
13. Ralston Avenue/Sixth Avenue	Signal	RCS	Replace standard crosswalks, Install bicycle detection, Stripe Crossbike markings, Install curb extensions

Table 5.2-3: Citywide Intersection Modifications Proposed Project/Alternative I

<i>Study Intersection</i>	<i>Control</i>	<i>Source/ Justification</i>	<i>Improvement</i>
14. Ralston Avenue/Fifth Avenue	Signal	BVSP	Install traffic signal in lieu of a pedestrian hybrid beacon to maintain signal coordination, Install median to allow only right-in/right-out movements, Install pedestrian refuge island
15. Ralston Avenue/El Camino Real (CMP)	Signal	RCS	Replace standard crosswalks, Signal timing update to account for increased time allocated for pedestrian crossing, Install Crossbike striping
16. Ralston Avenue/Old County Road	Signal	RCS	Replace standard crosswalks, Signal timing update to account for increased time allocated for pedestrian crossing, Install Crossbike striping
17. Ralston Avenue/Elmer Street	Signal	RCS	Install traffic signal in lieu of a pedestrian hybrid beacon to maintain signal coordination (volumes also satisfy peak hour warrant), Install pedestrian refuge island, Install curb extensions
18. Ralston Avenue/Hiller Street	Signal	RCS	Replace standard crosswalk, Signal timing update to account for increased time allocated for pedestrian crossing, Install bicycle detection
19. Ralston Avenue/US 101 Southbound Ramps	Signal	RCS	Replace standard crosswalk, Strip green bicycle conflict markings
20. Ralston Ave/US 101 NB Ramps – Island Pkwy	Signal		Maintain 2035 Intersection Configuration
21. Marine Pkwy/Shoreway Road – Oracle Parkway	Signal		Maintain 2035 Intersection Configuration
22. Alameda de las Pulgas/Carlmont Drive	Signal	Four Corners	Install traffic signal, remove one SB through lane, Restripe one NB through lane to left turn lane, Add one EB right turn lane
23. Alameda de las Pulgas/El Verano Way	Round-about	Four Corners	Install mini-roundabout, convert all approaches to one lane

Table 5.2-3: Citywide Intersection Modifications Proposed Project/Alternative I

<i>Study Intersection</i>	<i>Control</i>	<i>Source/ Justification</i>	<i>Improvement</i>
24. Alameda de las Pulgas/Chula Vista Drive	Round-about	Four Corners	Install mini-roundabout, convert all approaches to one lane
25. Alameda de las Pulgas/Cranfield Ave	Round-about	Four Corners	Install mini-roundabout, convert all approaches to one lane, reconfigure Cranfield Avenue approach to one leg
26. El Camino/Davey Glen Road	Signal		Maintain 2035 Intersection Configuration
27. El Camino Real/Middle Road	Signal		Maintain 2035 Intersection Configuration
28. El Camino Real/Hill Street	Signal	CPBMP	Install traffic signal in lieu of a pedestrian hybrid beacon to maintain signal coordination, Replace standard crosswalk, Install pedestrian refuge median, Install Crossbike striping, Install curb extensions
29. El Camino Real/Flashner Lane	TWSC	CPBMP	Install splitter median to facilitate right-in/right-out movements
30. El Camino Real/Emmett Avenue	Signal	CPBMP	Install traffic signal in lieu of a pedestrian hybrid beacon to maintain signal coordination, Replace standard crosswalk, Install pedestrian refuge median, Install Crossbike striping, Install curb extensions, Install median to prohibit left turns from Emmett Avenue on to El Camino Real
31. El Camino Real/Waltermire Street	TWSC	CPBMP	Install median to prohibit left turns from Waltermire Street on to El Camino Real
32. El Camino Real/O'Neill Avenue	Signal	CPBMP	Replace standard crosswalks, Install pedestrian refuge median, Install bicycle signal detection
33. El Camino Real/Harbor Boulevard (North)	Signal		Maintain 2035 Intersection Configuration
34. El Camino Real/Harbor Boulevard (South)	Signal		Maintain 2035 Intersection Configuration

Table 5.2-3: Citywide Intersection Modifications Proposed Project/Alternative I

<i>Study Intersection</i>	<i>Control</i>	<i>Source/ Justification</i>	<i>Improvement</i>
35. Old County Road/Masonic Way	Signal	Signal Warrant	Install traffic signal, Stripe bike lane, Replace standard crosswalk, Stripe SB left turn lane, Stripe NB right turn lane
36. Old County Road/O'Neill Avenue	TWSC		Maintain 2035 Intersection Configuration
37. Old County Road/Harbor Boulevard	Signal		Maintain 2035 Intersection Configuration
38. Fifth Avenue/Flashner Lane	AWSC	Acceptable Operation	Install all-way stop control at intersection, Install enhanced crosswalk, Install curb extensions
39. Fifth Avenue/Emmett Avenue	TWSC	Acceptable Operation	Install two-way stop control on Fifth Avenue, Replace standard crosswalk, Install curb extensions
40. Fifth Avenue/Waltermire Street	TWSC	Acceptable Operation	Install two-way stop control on Fifth Avenue, Replace standard crosswalk, Install curb extensions
41. Fifth Avenue/O'Neill Avenue	Signal	Signal Warrant	Install traffic signal, Replace standard crosswalk, Stripe NB left turn lane
42. Sixth Avenue/Flashner Lane	TWSC	Acceptable Operation	Install two-way stop control on Flashner Lane, Install enhanced crosswalk, Install curb extensions
43. Sixth Avenue/Emmett Avenue	TWSC	Acceptable Operation	Install two-way stop control on Emmett Avenue, Replace standard crosswalk, install curb extensions, Install enhanced crossing signage, Install Crossbike striping
44. Sixth Avenue/Waltermire Street	TWSC	Acceptable Operation	Install two-way stop control on Waltermire Street, Replace standard crosswalk, Install curb extensions
45. Sixth Avenue/O'Neill Avenue	Signal	Signal Warrant	Install traffic signal, Replace standard crosswalk, Stripe WB right turn lane

Notes: AWSC = All-way Stop Controlled, TWSC = Two-way Stop Controlled; RCS = Ralston Avenue Corridor Study and Improvement Plan; Four Corners = Alameda de las Pulgas/San Carlos Avenue Corridor Study and Improvement Plan; CPBMP = Comprehensive Pedestrian and Bicycle Master Plan

Table 5.2-4 summarizes the VMT generated by each alternative within the Planning Area. VMT per service population is calculated by dividing the total daily VMT by the combined total population and number of jobs in the Planning Area and Harbor Industrial Area TAZ. (In the table below, HIA refers to all jobs in the traffic analysis zone corresponding to the Harbor Industrial Area, even though some of these jobs are located in the City of San Carlos.) The HIA TAZ extends north-south from O'Neill Avenue in Belmont to Holly Street in San Carlos and east-west from US 101 to El Camino Real. The HIA TAZ contains mostly industrial uses, but it also includes the recently completed Palo Alto Medical Foundation Hospital located near the intersection of Industrial Boulevard and Holly Street. As the table shows, Alternative 1 would result in a slightly greater total VMT than the Proposed Project, while the No Project Alternative would result in the least overall VMT. However, the No Project would result in greater annual VMT per service population than the Proposed Project due to lower population growth, and similarly Alternative 1 would result in lower annual VMT per service population than the Proposed Project due to greater population growth and a more balanced jobs/housing ratio, which can reduce distances for commuting as well as trips (number and length) to access goods and services. The air quality and greenhouse gas emissions resulting from the associated VMT for each alternative are described in the above impact sections.

Table 5.2-4: Comparison of Alternatives' Vehicle Trips and Miles Traveled

<i>Metric</i>	<i>Proposed Project</i>	<i>Alternative 1</i>	<i>No Project</i>
Capita (Population + Jobs + HIA)	48,373	50,400	43,912
Total Population	30,500	32,800	29,000
Total Jobs	13,400	13,200	11,900
HIA Jobs	4,473	4,400	3,012
Daily Trips	157,319	162,547	139,604
Daily VMT	1,381,259	1,414,370	1,239,590
Daily VMT per Service Population	28.6	28.1	28.2

Source: CCAG-VTA 2040 Model, Dyett & Bhatia, Kittelson & Associates, Inc., 2016

Alternative 1 would generate fewer VMT per service population than both the Proposed Project and the No Project Alternative. Alternative 1 represents a decrease of approximately two percent of per service population daily VMT compared to the Proposed Project and one-half percent decrease compared to the No Project Alternative per service population daily VMT. However, Alternative 1 generates more daily vehicle miles traveled and trips compared to the No Project Alternative and the Proposed Project. The decrease in VMT per service population is anticipated based on slightly shorter trip lengths and slightly fewer trips per service population. The No Project Alternative is anticipated to increase trip lengths compared to the Proposed Project, but decrease the number of daily trips per service population. Alternative 1 would lessen the Proposed Project's impact based on daily VMT.

Intersection Operations

Under the No Project Alternative, 10 intersections would operate deficiently. The trips generated by the Proposed Project would cause 13 intersections to operate deficiently. Alternative 1 would generate approximately 5,000 additional daily trips over and above those generated by the land use plan of the Proposed Project. Alternative 1 would intensify development along the Ralston Avenue

corridor, with the addition of approximately 500 new households west of the BVSP Area and 475 new households in the BVSP Area along the corridor. All of the intersections operating deficiently under the Proposed Project would be expected to also operate deficiently under Alternative 1. The vehicle trips added to the roadway network from Alternative 1 would also cause additional intersections to operate deficiently.

Roadway Segment Operations

Under the No Project Alternative, the Proposed Project, and Alternative 1, Cipriani Boulevard, Alameda de las Pulgas, Old County Road, Ralston Avenue, and El Camino Real would be expected to operate at LOS E or worse. Alternative 1 would generate 500 additional trips on the roadway network during both the a.m. and p.m. peak periods; the addition of trips from Alternative 1 would cause further deterioration of roadway operations.

Pedestrian and Bicycle Activity

The number of pedestrians and bicyclists would be expected to increase with the Proposed Project compared to the No Project Alternative. Alternative 1 shares the Proposed Project's core vision and therefore would be expected to generate similar rates of additional pedestrian and bicycle activity but with a larger population. Therefore, the greatest increase in pedestrian and bicycle activity would be from Alternative 1, and the No Project Alternative would have the least growth in pedestrian and bicycle activity. Moreover, the No Project Alternative would lack some of the new infrastructure for pedestrians and cyclists intended to improve safety and comfort for travel by these modes, which may reduce levels of pedestrian and bicycle activity, increase morbidity and mortality related to those activities, or both.

Transit Ridership

Transit ridership would be expected to increase with the Proposed Project compared to the No Project Alternative. Alternative 1 shares the Proposed Project's core vision; the increase in density adjacent to Caltrain and other transit would be expected to generate additional ridership based on the additional housing proposed near transit hubs. Therefore, the greatest increase in transit riders would be from Alternative 1, and the No Project Alternative would have the least transit demand growth.

Hazardous Design Features

As with the Proposed Project, improvements to the transportation and circulation system proposed in Alternative 1 would be implemented over time. Any such improvements would be designed and constructed to local, State, and federal standards, and as such, would not be expected to introduce any hazardous design features. Both the Proposed Project and Alternative 1 include safety and comfort features for various travel modes that would not be implemented under the No Project Alternative, which could lead to existing design features that cannot safely or comfortably accommodate anticipated use.

UTILITIES

The Proposed Project and both alternatives would require utilities and infrastructure, including water, sewer, electricity, and landfill capacity. However, as discussed in Section 4.13 of this EIR,

“Utilities,” impacts under the Proposed Project, and by extension the other alternatives, would be less than significant with mitigation, due to compliance with federal, state, and local regulations, as well as the policies of each alternative. Furthermore, for the Proposed Project and Alternative 1, Mitigation Measures UTIL-1, UTIL-2, and UTIL-3, identified in Section 4.13 of this EIR, “Utilities,” require upsizing of water and wastewater facilities and decrease impacts with respect to utilities.

While Alternative 1 would result in more population growth than the Proposed Project, compliance with federal, state and local water regulations, as well as the Proposed Project policies that also apply to Alternative 1, would result in less than significant potential impacts to water service and infrastructure needs under the Proposed Project and Alternative 1. However, because Alternative 1 anticipates higher intensity of uses, especially near the Carlmont Village Center, it is possible that additional infrastructure may be needed in this area as compared with the Proposed Project. Within the BVSP Area, no major improvements are needed to the water system to accommodate growth over the next two decades according to Mid-Peninsula Water District (MPWD) for the Proposed Project, except for the upgrade from 6-inch to 8-inch water lines, which may be sufficient for Alternative 1’s higher population growth. While detailed utility modeling was not prepared for Alternative 1, it is anticipated that any needed utility infrastructure upgrades will be of a similar size and extent, since development will occur at magnitudes comparable to the Proposed Project and locations similar to the Proposed Project. The No Project Alternative would result in the least impacts to water for the Planning Area as well as the BVSP Area.

Similar to impacts to water service and infrastructure, compliance with wastewater regulations and Proposed Project policies would reduce impacts to wastewater to less than significant levels for the Proposed Project and Alternative 1. Within the BVSP Area, expected wastewater improvements under the Proposed Project and Alternative 1 include the upsizing of approximately 5,600 feet of pipeline downstream of Belmont Village to accommodate full buildout flow conditions, as well as the upsizing of the Shoreway Pump Station. The No Project Alternative would result in the least impacts to wastewater for the Planning Area as well as the BVSP Area. However, it should be noted that only 1,675 feet out of the 5,600 feet of pipe upsizing in the BVSP Area would be directly required because of the development anticipated under the BVSP. The remaining upsizing is necessitated by upcoming development projects that are not associated with the BVSP or the existing General Plan, and therefore could have occurred under the No Project Alternative.

Compliance with the City’s current grading, drainage, and stormwater regulations would ensure that the capacity of the stormwater drainage systems would not be exceeded, and impacts would be less than significant under the Proposed Project and both alternatives. Within the BVSP Area, several critical improvements that were identified under the City’s 2009 Storm Drain Master Plan would be implemented, to the same extent, over the horizon of any of the alternatives, including improvements to pipes along El Camino Real and Hiller Street, as well as improvements focused on Belmont Creek.

Potential impacts to solid waste would be reduced through compliance with SB X7-7, which has been set by CalRecycle to provide 75 percent recycling, composting, or source reduction of solid waste by 2020. Implementation of the Proposed Project policies would assist the City in complying with this new waste reduction goal under both the Proposed Project and Alternative 1. Alternative 1 would result in the highest service population at buildout, and thus the highest impact to solid waste for the Planning Area as well as the BVSP Area. The No Project Alternative would result in

the lowest population and jobs at buildout, and thus the least impacts to solid waste for the Planning Area as well as the BVSP Area.

5.4 Environmentally Superior Alternative

CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified (CEQA Guidelines Section 15126.6(e)(2)).

Table 5.2-5 shows a comparison of the relative impacts (as described above) by resource topic between Alternative 1 and the No Project alternative.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with Proposed Project goals and objectives, the No Project Alternative appears to be the environmentally superior alternative for this Program EIR. This conclusion is based on the amount and intensity of overall development which under the No Project Alternative would be less than Alternative 1 and the Proposed Project, and most environmental impacts are correlated with development intensity and quantity. The No Project Alternative reduces impacts that, in the Proposed Project, are significant, specifically in the topical area of air quality. On the other hand, the No Project Alternative has impacts that are greater than the Proposed Project with respect to aesthetics; energy, GHGs, and climate change; hazards and hazardous materials; and land use, housing, and population. Most notable is the topical area of land use, housing, and population, which has a less than significant impact in the Proposed Project, but has a significant impact in the No Project Alternative due to its conflicts with Plan Bay Area 2040. On balance, the No Project Alternative is still environmentally superior, as impacts are reduced in more topical areas than they are increased. However, the No Project Alternative does not meet the Proposed Project's core values, vision, purpose, and objectives as described in Section 3.2 of this EIR, "Purpose and Objectives of the Proposed Project," including the creation of a vibrant town center in the Belmont Village, increased economic diversity and sustainability, increased housing choice, and enhanced connectivity for bicyclists, walkers, and other non-drivers.

Table 5.2-5: Comparison of Proposed Project Impacts Relative to Alternative Impacts by Resource Topic

Resource Topic	Proposed Project Impact	Impact Compared to Proposed Project	
		Alternative 1	No Project
Aesthetics	Less Than Significant	Similar	Greater
Air Quality	Significant and Unavoidable	Greater	Less
Biological Resources	Less Than Significant	Similar	Similar
Cultural Resources	Less Than Significant with Mitigation	Similar	Less
Geology, Soils, and Seismicity	Less Than Significant	Similar	Similar
Energy, Greenhouse Gases, and Climate Change	Less Than Significant with Mitigation	Greater	Greater
Hazards and Hazardous Materials	Less Than Significant	Similar	Greater
Hydrology, Flooding, and Water Quality	Less Than Significant	Similar	Less
Land Use, Housing, and Population	Less Than Significant	Similar	Greater
Noise	Significant and Unavoidable	Greater	Less
Public Services and Recreation	Less Than Significant	Greater	Less
Transportation	Significant and Unavoidable	Greater	Similar
Utilities	Less Than Significant with Mitigation	Greater	Less
Conclusion			Environmentally Superior

The impacts of Alternative 1 are expected to be similar to those in the Proposed Project for most of the environmental impact categories analyzed in this EIR—aesthetics; biological resources; cultural resources; geology, soils, and seismicity; hazards and hazardous materials; hydrology, flooding, and water quality; and public services and recreation. However, the higher population supported by Alternative 1 in comparison to the Proposed Project would produce greater impacts in relation to population-related externalities such as police and fire services, schools, and demand for water supply and wastewater services. In addition, the longer construction duration of Alternative 1 would produce greater impacts related to noise.

Alternative 1 would support more housing and fewer jobs than the Proposed Project, which would result in a more balanced jobs/housing ratio. Because the analysis of the Proposed Project showed notable VMT reductions at the TAZ level in areas of high density mixed use, the original intention of the design of Alternative 1 was to create additional nodes of mixed use development in order to further reduce VMT, and, subsequently, air quality and greenhouse gas-related impacts. Housing is more evenly distributed throughout the Planning Area in Alternative 1, creating more of these mixed-use nodes and opportunities for shorter vehicle trips. While this balance does decrease VMT per service population relative to both the Proposed Project and the No Project Alternative by reducing trip lengths and the number of daily trips per service population, and would result in increased pedestrian/bicycle activity and transit ridership, the increased residential development in

Alternative 1 would still result in higher total VMT in the Planning Area and thus greater localized impacts to air quality and traffic congestion in the Planning Area, as well as greater impacts to energy, GHGs, and climate change. Overall, the Proposed Project would have a greater environmental impact than the No Project Alternative, but less of an impact than Alternative 1.

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